



1850 M Street, N.W., Suite 1100
Washington, DC 20036

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August 16, 1996

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M St., NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: CC Docket No. 95-116

Dear Mr. Caton:

Attached is the original plus 16 copies of Sprint Corp.'s Comments in the above-captioned proceeding. We have also provided Ms. Wanda Harris of the Competitive Pricing Division with this filing on diskette in WordPerfect 5.1 format.

Sincerely,

Norina Moy
Director, Federal Regulatory
Policy and Coordination

cc: Wanda Harris

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF SECRETARY

In the Matter of)
Telephone Number Portability) CC Docket No. 95-116

COMMENTS
of
SPRINT CORPORATION

Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
1850 M St., N.W., Suite 1110
Washington, D.C. 20036
(202) 857-1030

August 16, 1996

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Summary

In this phase of the local number portability proceeding, the Commission has solicited comment on issues relating to the recovery of costs associated with a system of permanent local number portability. Sprint agrees with the three general cost categories identified by the Commission (shared facilities costs, carrier-specific costs directly attributable to local number portability, and indirect carrier-specific costs) and provides additional detail on the types of costs in each category.

Sprint also recommends a cost recovery plan for these costs. We suggest that directly attributable shared third party database costs (e.g., for mandatory services such as data downloads, log-on ids, data ports) be recovered from the entities using those services or facilities on an incremental cost basis. Entities using discretionary services (e.g., usage reports) would pay incremental costs plus some reasonable contribution to overhead. Shared costs (e.g., data uploads, start up, and overhead) should be allocated to all telecommunications carriers which provide service in an area in which number portability is available based on their presubscribed lines.

Carrier-specific costs which are directly attributable to implementation of local number portability (e.g., switch software, an internal SMS, SCPs, and certain SS7 links) should be granted exogenous cost treatment (for price cap carriers) or, for rate of return carriers, through a surcharge-type mechanism. Indirect carrier-specific costs (e.g., those associated with

switch conversions and core SS7 upgrades, that portion of the AIN platform which supports CLASS services, and overhead costs) are endogenous and are not eligible for any special cost recovery treatment as part of this proceeding.

In the Matter of)
)
Telephone Number Portability) CC Docket No. 95-116

Sprint Corporation, on behalf of Sprint Communications Company, L.P. and the Sprint Local Telephone Companies, hereby respectfully submits its comments on the *Further Notice of Proposed Rulemaking* ("FNPRM") released July 2, 1996 in the above-captioned docket. In this phase of the proceeding, the Commission has sought comment on issues relating to the recovery of costs associated with a system of permanent local number portability. As discussed below, Sprint supports the Commission's classification of the broad categories of local number portability costs, and presents its suggestions for recovering those costs from all telecommunications carriers on a competitively neutral basis, as required by Section 251(e)(2) of the Telecommunications Act of 1996.

In the *FNPRM*, the Commission tentatively concluded that there are three categories of costs involved in providing long-term local number portability (§208):

(1) costs incurred by the industry as a whole, such as those incurred by the third-party administrator to build, operate and maintain the databases needed to provide number portability; (2) carrier-specific costs directly related to providing number portability (e.g., the costs to purchase the switch software implementing

number portability); and (3) carrier-specific costs not directly related to number portability (e.g., the costs of network upgrades necessary to implement a database method).

Sprint supports the Commission's proposed general cost categories, and believes that further refinement within each category is possible and appropriate for cost identification and recovery purposes. For example, within the shared third party database category, costs should be broken down to identify on-going and direct operating functions such as data downloads, log-on identification codes, data ports, reports, and audits; and nonrecurring and common costs such as developmental and start-up work, fixed costs, overhead and profit. Because it is not known at this time how many regional local number portability databases there will be, or what the service parameters will be, it is impossible to hazard a guess as to the likely costs.¹

Carrier-specific costs, at least for the network architecture envisioned by Sprint, will include:

- local number portability switch software which directs the switch to perform a database lookup;

¹ RFPs for a state-wide local number portability SMS database have been issued in both Illinois and Maryland. Once an administrator has been chosen in these states, additional information on the estimated costs associated with the shared third party database will become available. It will obviously be more costly to provision a regional rather than a single state database service; however, the increase in costs is not expected to be proportional to the increase in the number of states (that is, it should not be five times as expensive to administer a 5-state regional database as it is to administer a single state database). The greater number of entities using a regional database as compared to a single state database should also contribute to lower unit costs.

- TOPS switch software which allows the operator to query the local number portability database;²
- processor upgrade software, which increases the capacity of the switch to accommodate the local number portability software;
- AIN start-up switch software, which provides the platform for handling local number portability (and other AIN) service triggers;³
- an internal SMS and related operational support systems for uploading and downloading information to and from the shared local number portability databases;⁴
- SCP pairs for launching queries against the internal SMS;
- links between the SCPs and internal SMS;
- links between the internal SMS and the shared SMS.

Sprint has issued an RFP for its internal SMS and is holding discussions with its vendors regarding necessary switch software upgrades. Therefore, it is difficult at this point to estimate its carrier-specific costs directly attributable to local number portability. However, our preliminary analysis indicates that the Sprint LECs will incur approximately \$100 million for the elements listed above to provide local number portability capability in those top 100 MSAs in which they have a presence.

² This software will be deployed only in those host switches which currently have operator service functionality.

³ Only those AIN start-up costs directly attributable to local number portability capability should be granted exogenous cost treatment (discussed below) here.

⁴ Because of the volume of data being transferred and received, and the expected volume of queries, Sprint expects that at least one SCP mated pair and an internal SMS almost exclusively dedicated to local number portability will be required. (Existing facilities used for 800 database and LIDB queries do not have the capacity to accommodate local number portability requirements.) However, the costs associated with any portion of these facilities used to provide services other than local number portability would be allocated to those other services.

Except for recurring costs associated with uploading and downloading SMS data, the carrier-specific costs listed above are expected to be one-time implementation expenses.

The third category of costs are for carrier-specific network upgrades not specifically incurred to implement local number portability. These costs include network modernizations such as switch conversions (replacement of older switches which cannot support the new local number portability software)⁵ and core SS7 upgrades.

II. COST RECOVERY AND ALLOCATION.

Section 251(e)(2) of the Act requires that the cost of establishing number portability "shall be borne by all telecommunications carriers on a competitively neutral basis as determined by the Commission." The Commission has proposed two principles for evaluating all local number portability cost recovery mechanisms: the mechanism should not give one service provider "an appreciable, incremental cost advantage over another service provider, when competing for a specific subscriber"; and "should not have a disparate effect on the ability of competing service providers to earn a normal return" (FNPRM, ¶210). Sprint endorses these principles, and believes that its proposed cost recovery plan, described below, satisfies these principles.

⁵ In Sprint's case, the indirect costs associated with switch conversions are expected to be approximately equal to the direct costs of implementing local number portability.

A. Shared Facilities (FNPRM, ¶¶212-220).

In the Order accompanying the instant *FNPRM*, the Commission found that a local number portability architecture "that uses regionally-deployed databases best serves the public interest" (¶91). Sprint believes that the Commission has the authority and responsibility under Section 251(e)(2) to adopt a cost recovery mechanism for costs associated with these shared regional databases. Federal standards will help to ensure uniformity in the rate structures, terms and conditions associated with the use of these databases.⁶

Sprint recommends that the costs of providing database services and facilities necessary for call completion and used by a specific, identifiable entity -- downloads, log-on ids, and data ports -- should be recovered from those entities on an incremental cost basis. Discretionary services such as usage reports or audit services should be priced at incremental cost plus some reasonable contribution to overhead or common costs, here again being recovered from each subscriber of that service. Allocation of these directly attributable costs on an incremental cost basis

⁶ Sprint recommends that the independent entity or entities chosen to administer each regional database be required to make the contract governing use of these databases publicly available, for example by placing them on file with the FCC. The shared local number portability databases, like the SMS/800 database, contain essential routing information. However, unlike the SMS/800, which was and remains controlled by the BOCs, the regional local number portability databases are expected to be developed with input from all segments of the telecommunications industry, neutrally administered, and competitively bid. These factors mitigate concerns about the likelihood of discrimination and unreasonable rates -- concerns which led the Commission to mandate federal tariffs for the SMS/800.

is appropriate because it allows recovery of costs from the entity requesting the service -- the cost causer.

Sprint further recommends that the shared database costs associated with data uploads, start up, and overhead, plus a reasonable profit, be allocated to all telecommunications carriers which provide local service in an area in which number portability is available, in proportion to each carrier's share of pre-subscribed local service lines.⁷ Because these common costs cannot be directly attributed to a specific database service subscriber, recovery on the basis of presubscribed lines is appropriate since, as the Commission specifically stated, all consumers in an area in which number portability is available benefit from such capability, even if they do not switch to another local service provider.⁸ Allocation of these costs based on presubscribed lines is also competitively neutral, since payments would change in proportion to any change in a carrier's share of total local service subscribers, with the unit charge set at the same level for each new subscriber gained by any service provider. Thus, Sprint's proposed cost allocation method would avoid giving one service provider an "appreciable, incremental cost advantage over another service provider, when competing for a specific sub-

⁷ These costs could be amortized over the life of the database administrator's contract to assure reasonable opportunity for cost recovery as well as to minimize the rate impact on database service subscribers and their end users.

⁸ The incumbent LEC (ILEC) may be expected to offer lower prices, improved services, and additional services as a result of competitive pressures. Thus, ILEC customers benefit from competition even if they remain with the ILEC. See Order, ¶30.

scriber," and would not have "a disparate effect on the ability of competing service providers to earn normal returns on their investment" (§210). Data on each local service provider's total presubscribed lines could be updated quarterly to ensure that common cost allocations reflect up-to-date market share figures.

The Commission has proposed the costs associated with the local number portability databases be allocated "in proportion to each telecommunications carrier's total gross revenues minus charges paid to other carriers" (§213). Sprint believes that presubscribed lines are a better basis for allocating these costs. First, the Commission itself has recognized that recovery of interim local number portability costs on the basis of relative share of active telephone numbers would be competitively neutral (§135). The same is true for recovery of costs for the shared regional local number portability databases.

Second, lines can be measured for the specific area in which number portability is available and thus reflect each carrier's market share in the geographic area covered by the regional database. Revenue data for the relevant geographic area may be more difficult to obtain,⁹ especially for national carriers, and might not provide as accurate a picture of the degree of basic local service competition as presubscribed lines. For example, market share as measured by net revenues might be overstated because such revenues include different mixes of services offered

⁹ It would make little sense to allocate the costs of a regional database based upon carriers' national revenues or revenues from services other than local service.

at different rates (e.g., one carrier may earn a large percentage of its revenues from sale of more costly features such as CLASS services), or might be understated because revenues reflect promotional discounts on basic local service (e.g., an end user may receive free basic local service if he or she also presubscribes to the service provider's cable or long distance service). Measuring market share of basic local service on the basis of presubscribed lines avoids these distortions.

B. Carrier-Specific Costs To Implement Local Number Portability (FNPRM, ¶¶221-225).

The Commission has suggested that carrier-specific costs to implement local number portability can be recovered in at least two ways: individual carriers could bear their own costs, or all carriers in a given region could pool their costs, which would then be recovered from all carriers providing and using number portability, based on some allocator (¶221). Sprint believes that individual carrier recovery should be required.

In a competitive environment, each service provider is responsible for recovering its own costs. If one carrier is for any reason particularly efficient in its deployment of local number portability capability, it should be allowed to enjoy the benefits of such efficiency. Requiring the more efficient carrier to shoulder a portion of the higher costs incurred by its less efficient competitors blunts any incentive for the less efficient carrier to improve its operations, and constitutes a form of cross-subsidy which distorts economically rational pricing.

This is not to say that any carrier should be denied a reasonable opportunity to recover its costs of deploying local number portability capability.¹⁰ As discussed further in Section II.D below, carriers should be given the opportunity to adjust their local service rates to reflect allowable local number portability costs, either through an exogenous cost adjustment for price cap carriers or an equivalent surcharge-type adjustment for rate of return carriers. Carriers should file their cost recovery plans and the related cost support with the FCC to ensure compliance with the Commission's cost recovery criteria.

C. Indirect Carrier-Specific Costs (FNPRM, ¶¶226-229).

Carriers incur various kinds of indirect costs: network upgrades which benefit the carrier's subscribers generally; network upgrades which enable the carrier to offer specific capabilities other than local number portability; and overhead costs. None of these costs is directly related to number portability, and none should be included in any local number portability cost recovery mechanism.

In 800 database proceeding, the Commission concluded that "costs not specifically incurred for the implementation and operation of the 800 database system, such as core SS7 costs," would not be granted exogenous cost treatment.¹¹ The same

¹⁰ Carriers should also be given the opportunity to recover their incurred and allocated share of costs associated with the shared local number portability database discussed in Section II.A above.

¹¹ *Provision of Access for 800 Service*, 8 FCC Rcd 907, 911 (¶28) (1993).

approach should be adopted here. Similarly, costs associated with network investments which can be used to provide services or features other than local number portability -- for example, conversions to new switches and that portion of an AIN or IN platform and of the SCPs used to provide CLASS features¹² -- should be recovered from customers of those other services and features, or from the carrier's shareholders.

In the 800 Database proceeding, the Commission also denied exogenous cost treatment for overhead allowances, except where the carrier was able to prove that such costs increased specifically because of its 800 database obligations. As the Commission explained, "[u]nder price caps, the carriers are already recovering their pre-existing overhead costs in their normal rates and allowing them to also recover overhead costs through their exogenous costs may provide them with an excessive recovery of these costs unless they had experienced an actual increase in overhead costs specifically attributable to the implementation or operation of the basic data base 800 service."¹³ The same standard should apply as regards implementation of a system of local number portability.

¹² However, as noted above, Sprint anticipates that the volume of data and queries associated with local number portability will cause its AIN platform and the new SCPs pair(s) to be used primarily for the provision of local number portability.

¹³ *In the Matter of BOCs' Tariff for the 800 SMS, Tariff FCC No. 1, and 800 Data Base Access Tariffs*, 8 FCC Rcd 5132, 5134 (¶17) (1993).

D. Exogenous Cost Treatment (FNPRM, ¶230)

As discussed above, carriers should be given the opportunity to recover their costs for using the shared number portability database, and their direct costs associated with the hardware and software needed to provide number portability capability. Granting exogenous cost treatment for price cap carriers, and an equivalent surcharge-type mechanism for rate of return carriers, for these direct costs is warranted since implementation of local number portability capability was mandated by Congress and represents a decision beyond the control of the carrier.¹⁴ (Indeed, absent Congressional and Commission mandate, it is doubtful that any incumbent LEC would deploy local number portability capability.)

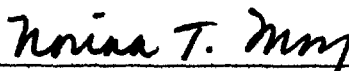
Both price cap and rate of return carriers should file sufficient information with the Commission to evaluate the reasonableness of the proposed rate adjustment. For price cap carriers, this would include a detailed showing of the specific amounts associated with each direct cost for which exogenous treatment is claimed. Rate of return carriers would provide information on its total claimed number portability implementation costs as well as the customer base over which it intends to recover such costs. Sprint recommends that carriers be given the

¹⁴ Although it is not precisely a repackaging of the mandated interim local number portability capability, the long term local number portability database solution more closely resembles a restructured than a new service offering, and thus exogenous cost treatment is appropriate.

discretion to determine the geographic scope of their cost recovery plan, but that the Commission specify a consistent timeframe over which those costs are to be recovered (i.e., either on a monthly or annual basis) to avoid double charging customers who choose to switch to another local service provider.¹⁵ Carriers should not specifically identify any number portability charges on consumer bills as a separate line item (§224), since this would likely generate customer confusion.

Respectfully submitted,

SPRINT CORPORATION



Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
1850 M St., N.W., Suite 1110
Washington, D.C. 20036
(202) 857-1030

August 16, 1996

¹⁵ For example, if a customer pays an annual fee to the incumbent LEC, but then switches to another carrier which assesses a monthly number portability fee, the customer would be double charged.

CERTIFICATE OF SERVICE

I, Joan A. Hesler, hereby certify that on this 16th day of August, 1996, a true copy of the foregoing document was served first class mail, postage prepaid, or hand delivered, upon each of the parties attached.


Joan A. Hesler

James Hobson
Donelan, Cleary, Wood
& Maser
1100 New York Avenue, N.W.
Suite 750
Washington, D.C. 20005

Mark O'Connor
Piper & Marbury
1200 19th Street, N.W.
7th Floor
Washington, D.C. 20036

Richard Askoff
NECA
100 S. Jefferson Road
Whippany, NJ 07981

Lisa Zaina
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

David Cosson
Marie Guillory
NTCA
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Judith S. Ledger-Roty
John Hunter
Reed, Smith, Shaw & McClay
1301 K Street, N.W.
Suite 1100 East Tower
Washington, D.C. 20005

Joel Levy
Cohn & Marks
1333 New Hampshire Ave., N.W.
Suite 600
Washington, D.C. 20036

William Roughton
PCS Primeco
1133 20th Street, N.W.
Suite 850
Washington, D.C. 20036

Glenn Richards
Fisher Wayland Cooper
Leader & Zaragoza
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20006

Mark Golden
PCIA
1019 19th Street, N.W.
Suite 1100
Washington, D.C. 20036

Richard Muscat
Texas Attorney General's Ofc.
Consumer Protection Division
P.O. Box 12548
Capitol Station
Austin, TX 78711

Gordon Scherer
Scherers Communications Group
575 Scherers Court
Worthington, OH 43085

Pat Wood
Texas PUC
7800 Shoal Creek Blvd.
Austin, TX 78757

Margot Smiley Humphrey
Koteen & Naftalin
1150 Connecticut Ave., N.W.
Suite 1000
Washington, D.C. 20036

Brian Conboy
Sue Blumenfeld
Thomas Jones
Wilkie Farr & Gallagher
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

Charles Hunter
Kevin DiLallo
Hunter & Mow
1620 I Street, N.W.
Suite 701
Washington, D.C. 20006

Pamela Portin
U.S. Airwaves, Inc.
10500 N.E. 8th Street
Suite 625
Bellevue, WA 98004

Gregory Casey
Telemation International
6707 Democracy Blvd.
Bethesda, MD 20817

J. Manning Lee
Teleport Communications Corp.
2 Teleport Drive, Suite 300
Staten Island, NY 10311

Stephen Kreskin
Thomas Moorman
Krasken & Lesse
2120 L Street, N.W. #520
Washington, D.C. 20037

Jere Glover
Barry Pineles
U.S. SBA
409 3rd Street, S.W. #7800
Washington, D.C. 20416

Betsy Anderson
Duane Thompson
Bell Atlantic
1320 N. Court House Road
Arlington, VA 22201

Mary McDermott
Linda Kent
Charles Cosson
USTA
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Maureen Thompson
NYNEX
1095 Avenue of the Americas
New York, NY 10036

Lucie Mates
Teresa Cabral
Sarah Rubenstein
Pacific Bell
140 New Montgomery Street
Room 1526
San Francisco, CA 94105

Albert Halprin
Melanie Haratunian
Halprin, Temple, Goodman
& Sugrue
1100 New York Avenue, N.W.
Suite 650, East Tower
Washington, D.C. 20005

Larry Peck
Frank Panek
Ameritech
Room 4H86
2000 W. Ameritech Ctr. Drive
Hoffman Estates, IL 60196

Robert Lynch
Mary Marks
J. Paul Walters
SBC Communications
175 East Houston
Room 1262
San Antonio, TX 78205

William Barfield
Jim Llewelyn
BellSouth
Suite 1800
1155 Peachtree Street, N.E.
Atlanta, GA 30329

Dan Poole
Jeffrey Bork
U.S. West
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

* Hand Delivered
** 2 Copies Hand Delivered

Regina Keeney*
Chief, Common Carrier
Bureau
Federal Communications Comm.
1919 M Street, N.W.
Room 500
Washington, D.C. 20554

Competitive Pricing Division
Federal Communications
Commission
1919 M St., Room 518
Washington, D.C. 20554

Matthew Harthun*
Policy Division
Federal Communications Comm.
Room 544
Washington, D.C. 20554

International Transcription
Service*
1919 M Street, N.W.
Washington, D.C. 20554

Werner Hartenberger
J.G. Harrington
Dow Lohnes & Albertson
1255 23rd St., N.W., #500
Washington, D.C. 20037

Carl Northrop
AirTouch Paging/Arch Comm.
700 13th Street, N.W.
Suite 700
Washington, D.C. 20005

Charles Helein
ACTA
8180 Greensboro Drive
McLean, VA 22102

Robert Gurs
Wilkes, Artis, Hedrick & Lane
1666 K Street, N.W., #1100
Washington, D.C. 20006

Richard Metzger
ALTS
1200 19th Street, N.W.
Suite 560
Washington, D.C. 20036

Mark Rosenblum
John Langhauser
Clifford Williams
AT&T
Room 3244J1
295 No. Maple Avenue
Basking Ridge, NJ 07920

Danny Adams
Steven Augustino
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

David Jatlow
Young & Jatlow
2300 N Street, N.W.
Suite 600
Washington, D.C. 20037

Cynthia Miller
Florida PSC
2540 Shumard Oak Blvd.
Room 301
Gerald L. Gunter Bldg.
Tallahassee, FL 32399

Kathy Shobert
GCI
901 15th Street, N.W.
Suite 900
Washington, D.C. 20005

Emily Hewitt
Michael Ettner
GSA
18th And F Streets, N.W.
Room 4002
Washington, D.C. 20405

John Malloy
GO Communications Corp.
201 North Union Street
Suite 410
Alexandria, VA 22314

David Kahn
Bellatrix International
4055 Wilshire Blvd.
Suite 415
Los Angeles, CA 90010

John Scott
Crowell & Moring
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Ellen LeVine
California PUC
505 Van Ness Avenue
San Francisco, CA 94102

Alan Gardner
Jennifer Johns
CCTA
4341 Piedmont Avenue
Oakland, CA 94611

Michael Altschul
Randall Coleman
Brenda Pennington
CTIA
1250 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20036

Thomas Taylor
Christopher Wilson
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

David Guidino
GTE
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Robert Shoonmaker
GVNW
2270 La Montana Way
Colorado Springs, CO 80918

Catherine Sloan
Richard Whitt
Worldcom, Inc.
1120 Connecticut Ave., N.W.
Suite 400
Washington, D.C. 20036

Harold Stoller
Richard Wolters
Illinois Commerce Commission
527 E. Capitol Avenue
P.O. Box 19280
Springfield, IL 62794

Richard Nelson
Marion County Board of
County Commissioners
2631 SE 3rd Street
Ocala, FL 34471

Edwin Lavergne
Darren Nunn
Ginsberg, Feldman & Bress
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Loretta Garcia
Donald Elardo
MCI
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Robert Wienski
Sam LaMartina
ITN
8500 W. 110th Street, N.W.
Suite 600
Overland Park, KS 66210

Andrew Lipman
Russell Blau
Swidler & Berlin
3000 K Street, N.W.
Washington, D.C. 20007

Christopher Savage
Cole, Raywid & Braverman
1919 Pennsylvania Ave., N.W.
Suite 200
Washington, D.C. 20006

Roger Steiner
Missouri PUC
P.O. Box 360
Jefferson City, MO 65102

Paul Rodgers
Charles Gray
James Ramsey
NARUC
1102 ICC Bldg.
P.O. Box 684
Washington, D.C. 20044

Mary Burgess
NYS DPS
3 Empire State Plaza
Albany, NY 12223

Daniel Brenner
Neal Goldberg
David Nicoll
NCTA
1724 Massachusetts Ave., N.W.
Washington, D.C. 20036

Robert Foosaner
Nextel Communications
800 Connecticut Avenue, N.W.
Suite 1001
Washington, D.C. 20006

Ann Henkener
Ohio PUC
180 E. Broad Street
Columbus, OH 43266